

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ALABAMA, NORTHERN DIVISION

IN RE:)	
)	
JAMES DEWAYNE MANNING,)	CASE NO. 16-81059-CRJ11
SSN: XXX-XX-9474)	CHAPTER 11
)	
KELLY A. MANNING,)	
SSN: XXX-XX-1222)	
)	
Debtors.)	

EMERGENCY MOTION TO SUSPEND PLAN PAYMENTS

COME NOW the debtors James Dewayne Manning and Kelly A. Manning ("Debtors"), by and through their undersigned counsel of record and file this Emergency Motion to Suspend their Chapter 11 Plan payments, pursuant to the Order Granting Amended Motion to Modify Plan Payments (Doc 240), and in support thereof would show unto the Court as follows:

1. Debtor, James Dewyane Manning ("Mr. Manning"), is employed by Stryker, a company that offers products and services in Orthopaedics, Medical and Surgical, and Neurotechnology and Spine that help improve patient and hospital outcomes.

2. As the Coronavirus (COVID-19) outbreak continues to dominate headlines most medical facilities are postponing all non-urgent/elective surgeries which constitutes the majority of Mr. Mannings income.

3. The Debtors seek to suspend their Chapter 11 Plan payment for the months of April, May and June; and resume their Chapter 11 Plan payments in July 2020.

WHEREFORE, the Debtors respectfully request this Court to grant a ninety (90) day moratorium on Plan payments, and to grant such other and further relief as this Court deems just and proper.

Respectfully submitted this the 25th day of March, 2020.

/s/ Stuart M. Maples

STUART M. MAPLES

(ABS-1974-S69S)

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CERTIFICATE OF SERVICE

I do hereby certify that on March 25, 2020, a copy of the foregoing document was served on the following by Electronic Case Filing a copy of the same.

Richard Blythe
Bankruptcy Administrator
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Kevin Heard
Examiner
kheard@heardlaw.com

All parties requesting notice

/s/ Stuart M. Maples

STUART M. MAPLES